

EXHIBIT B

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**DECLARATION OF ALEXANDER P.
 FRAWLEY IN SUPPORT OF
 PLAINTIFFS' MOTION FOR LEAVE TO
 FILE A SURREPLY IN OPPOSITION TO
 GOOGLE'S MOTION TO DISMISS THE
 FIRST AMENDED COMPLAINT**

The Honorable Richard Seeborg
 Courtroom 3 – 17th Floor
 Date: March 4, 2021
 Time: 1:30 p.m.

DECLARATION OF ALEXANDER P. FRAWLEY

I, Alexander P. Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 81). I have personal knowledge of the matters set forth herein and am competent to testify.

2. On February 11, 2021, I spoke by telephone with Eduardo Santacana, counsel for Defendant, Google LLC (“Google”), regarding Plaintiffs’ intention to move for leave to file a Surreply in opposition to Google’s Motion to Dismiss the First Amended Complaint. I explained the three issues that Plaintiffs’ proposed Surreply addresses, and I asked whether Google would stipulate to allowing Plaintiffs to file the Surreply.

3. On February 16, 2021, Mr. Santacana informed me by email that Google plans to oppose Plaintiffs’ motion in full. Accordingly, the parties have not reached a stipulation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of February, 2021, at New York, New York.

/s/ Alexander P. Frawley